

Comments in Response to Localism Notice of Proposed Rulemaking MB Docket No. 04-233

I would like to take a moment to share my experiences and views concerning the value of Christian radio broadcasting.

As a listener and avid supporter of Christian radio broadcasting, I possess the distinct pleasure of having both a national and local Christian radio station that I listen to. I am immensely thankful for the encouraging and spiritually-uplifting message that both of these stations bring to me and countless other listeners in my area and around the nation.

With so many stations that broadcast material contrary to the beliefs and standards I hold, it is wonderful to know that there exist both national and local Christian radio stations that promote a positive and nourishing message. To enact procedures that could directly limit these stations' ability to share their views is not only in conflict with the Constitution's protection of free speech, but is also a blow to the sharing of a moral, beneficial, and hope-filled message.

It is with these thoughts and observations that I submit the following objections to the proposed FCC rules concerning radio broadcasting. I have read and agree with their message:

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so – even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such

things as who produced what programs would intrude on constitutionally-protected editorial choices.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

I urge the FCC not to adopt rules, procedures or policies discussed above.

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Signature

4/26/08
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